U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Montco Research Products Inc Removal - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #2**
Montco Research Products Inc Removal

Palatka, FL
Latitude: 29.6701931 Longitude: -81.7917216

To: James Webster, USEPA R4 ERRPPB
Nick Roff, FLDEP

From: Courtney Swanson, FOSC
Date: 2/23/2021
Reporting Period: 2/01/2021 - 2/23/2021

1. Introduction

1.1 Background

Site Number:	04J7	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	8/6/2020
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	10/12/2020	**Start Date:**	10/12/2020
Demob Date:		**Completion Date:**	
CERCLIS ID:	FLD061897054	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

1.1.2 Site Description

The Site is a commercial/industrial property of approximately 31.7 acres in size located in a rural area of Putnam County. The Site was a chemical manufacturing facility that ceased operations in 2018 due to a fire at the facility in June 2018. The Site includes, but is not limited to, a production building, vacuum pump area, reactor area, tank farm, office building, two storage/warehouse buildings, and a residential building, and several small utility/storage structures. The facility previously produced three chemical intermediate products in batch processes, including chloromethyl-napthalene (CMN), ethylbenzyl chloride (EBC), and alphanapthalide (ANA). From June 2018 until November 2019, the Florida Department of Environmental Protection (FDEP) worked with the facility's owner and the facility's operator, Montco Research Products, Inc., to remove remaining wastes and other materials from the Site. The Site was referred to the U.S. Environmental Protection Agency by FDEP in November 2019 for evaluation for a possible Time Critical Removal Action. According to FDEP's November 2019 referral checklist, 20,000 gallons of spent hydrochloric acid, 185,660 gallons and 78,000 pounds of spent zinc chloride, 11,800 gallons of used naphthalene, and 3,750 gallons of spent ethylbenzene remain on Site.

1.1.2.1 Location

The Site is located at 209 Janice Drive in Palatka, Putnam County, Florida. The Site is situated at the eastern terminus of a dirt road in a rural area of Putnam County. The Site is bounded on the north, south, and east by undeveloped forest and wetlands, including Rice Creek Swamp and Rice Creek, a tributary of the St. John River. The area to the west of the Site consist of low density residential properties.

1.1.2.2 Description of Threat

Large quantities of hazardous waste, including strong acids and flammables, are stored on site in approximately 800 drums and barrels and approximately 75 large (1,000 to 20,000 gallon) containers (tanks, reactors, and condenser vessels)

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

In November 2019, FDEP requested that the EPA evaluate the Site for a possible Time Critical Removal Action. On November 20, 2019, the EPA conducted an initial Site Inspection. Also present at the time of the inspection were representatives of FDEP and the owner/operator of the facility. In the course of conducting the initial Site Inspection, the EPA OSC observed four large (2,000 - 4,000 gallon) vessels leaking materials into containment areas as well as four bulging, fire-damaged drums and stained concrete and distressed vegetation in areas downgradient of the storage tanks and process vessels. The EPA OSC initiated an Emergency Response in order to stabilize the drums and remove materials from the leaking vessels. Field measurements made during the initial Site Inspection and during the Emergency Response, as well as information provided by the owner/operator and a facility employee, indicated that materials stored in, and leaking from, several of the large vessels were hazardous substances. Material leaking from two vessels were found to be corrosive (one indicated a pH of ~13, the other ~1). The third leaking vessel reportedly contained ethylbenzene, an ignitable substance. The fourth vessel reportedly contained used

hydraulic oil contaminated with hydrochloric acid. Conflicting accounts were provided by a facility employee as to the contents of the bulging, fire-damaged drums. Given the confusion concerning the drums contents and the destruction of any labels that may have been affixed to them due to the June 2018 fire, the drums were treated as containing unknown materials. Private water supply wells at two nearby residential properties were sampled concurrently with the Emergency Response. Samples were analyzed for semivolatile organic compounds, volatile organic compounds, inorganic anions, pH, and metals. None of the analytes were present in either sample at levels above the values established by the EPA Drinking Water Standards and Health Advisories (EPA 822-F-18-001) promulgated by the EPA Office of Water, except that iron was present in one sample at a level that exceeds the Secondary Drinking Water Regulation.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On October 12th ERRS and START contractors, as well as the EPA OSC, mobilized to the Site for the purpose of conducting hazard categorization and obtaining volume estimates for the contents of approximately 800 drums and barrels and approximately 75 large (1,000 to 20,000 gallon) vessels.

2.1.2 Response Actions to Date

Beginning on October 12th,ERRS staged all drums and barrels in order to allow access during sampling. Access points for all of the large vessels were identified and, if necessary, bolts were loosened. Samples were then taken from all drums, barrels, and large vessels for hazard categorization and hazard categorization tests performed. All sampling was conducted in level B or C PPE and hazard categorization was conducted in level C.

Water within an unroofed containment area was found to have a low pH (approximately 2 - 2.5). The water within that and a second containment area was transferred by vacuum trailer and disposed of at Water Recovery Inc's facility in Jacksonville Florida.

While clearing out a small lab space which the facility previously used for quality control analysis, a mercury spill was discovered. The spill was small, probably 10-15 ml. The lab space, an adjoining office, and the corridor between were evacuated and sealed off. The rest of the building in which the mercury spill had occurred consists of a single large room with large open doorways previously used as a maintenance shop. Mercury vapor readings inside the maintenance bay were taken with a Lumex 915 and compared to the OSHA PEL (0.1 mg/ cu m). No detections above 200 ng/cu m (0.0002 mg/cu m) were made. ERRS personnel removed the spilled mercury and placed it in a flask for disposal. Several other small containers of mercury (totaling approximately 30 lbs) were also found in the lab space

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
Low pH water	water accumulated in containment areas	53,322 Gal			Water Recovery Inc.

2.2 Planning Section

2.2.1 Anticipated Activities

Once bids for disposal have been received and disposal contracts awarded, ERRS will mobilize to the Site to conduct disposal operations.

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

Request for Bid package is being prepared.

2.2.2 Issues

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

A Fund lead action memo was signed on August 6, 2020 establishing a total ceiling for the removal action of $1,686,000.00.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$1,300,000.00	$116,482.00	$1,183,518.00	91.04%
TAT/START	$105,000.00	$0.00	$105,000.00	100.00%

Intramural Costs				
USEPA - Direct	$50,000.00	$10,000.00	$40,000.00	80.00%
Total Site Costs	$1,455,000.00	$126,482.00	$1,328,518.00	91.31%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.